

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES, LLC,

Defendant.

In re:

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF AGENDA FOR MATTERS SCHEDULED  
FOR HEARING ON JULY 13, 2022 AT 10:00 A.M.**

**CONTESTED MATTERS**

1. **11-02542; Picard v. Parson Finance Panama S.A.**

A. Memorandum of Law of Parson Finance Panama S.A. in Support of its Motion to Dismiss filed by Douglas A. Kellner on behalf of Parson Finance Panama S.A. (Filed: 2/18/2022) [ECF No. 93]

- B. Declaration of Christian Verling filed by Douglas A. Kellner on behalf of Parson Finance Panama S.A. (Filed: 2/18/2022) [ECF No. 94]
- C. Declaration of Douglas A. Kellner filed by Douglas A. Kellner on behalf of Parson Finance Panama S.A. (Filed: 2/18/2022) [ECF No. 95]

**Opposition Due:** April 19, 2022

**Opposition Filed:**

- D. Trustee's Memorandum of Law in Opposition to Defendant Parson Finance Panama S.A.'s Motion to Dismiss the Complaint filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 4/19/2022) [ECF No. 96]
- E. Declaration of Matthew D. Feil in Support of the Trustee's Memorandum of Law in Opposition to Defendant Parson Finance S.A.'s Motion to Dismiss (Filed: 4/19/2022) [ECF No. 97]

**Replies Due:** May 31, 2022

**Replies Filed:**

- F. Reply Memorandum of Parson Finance Panama S.A. in Support of its Motion to Dismiss filed by Douglas A. Kellner on behalf of Parson Finance Panama S.A. (Filed: 5/31/2022) [ECF No. 101]

**Related Documents:**

- G. Stipulation and Order signed on 12/13/2021. (DuBois, Linda) (Entered: 12/13/2021) [ECF No. 90]
- H. Amended Stipulation and Order signed on 1/13/2022 (DuBois, Linda) (Entered: 1/13/2022) [ECF No. 91]
- I. Notice of Motion to Dismiss filed by Douglas A. Kellner on behalf of Parson Finance Panama S.A. (Filed: 2/18/2022) [ECF No. 92]
- J. Stipulation and Order to Amend Briefing Schedule signed on 5/20/2022 (DuBois, Linda) (Entered: 05/20/2022) [ECF No. 100]

**Status:** This matter is going forward.

2. **12-01002; Picard v. The Public Institution for Social Security**

- A. Memorandum of Law in Support of The Public Institution for Social Security's Motion to Dismiss filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 2/25/2022) [ECF No. 118]
- B. Declaration of Leo Muchnik in Support of PIFSS Motion to Dismiss filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 2/25/2022) [ECF No. 117]

**Opposition Due:** April 26, 2022

**Opposition Filed:**

- C. Trustee's Memorandum of Law in Opposition to Defendant's Motion to Dismiss the Complaint filed by Brian Song on behalf of Irving H. Picard (Filed: 4/26/2022) [ECF No. 122]
- D. Declaration of Brian W. Song in Opposition to Defendant's Motion to Dismiss the Complaint filed by Brian Song on behalf of Irving H. Picard, (Filed: 4/26/2022) [ECF No. 123]

**Replies Due:** May 26, 2022

**Replies Filed:**

- E. Reply in Support of The Public Institution for Social Security's Motion to Dismiss filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 5/26/2022) [ECF No. 128]

**Related Documents:**

- F. Stipulation and Order signed on 12/21/2021. (DuBois, Linda) (Entered: 12/21/2021) [ECF No. 112]
- G. Amended Stipulation and Order signed on 2/7/2022 (DuBois, Linda) (Entered: 2/7/2022) [ECF No. 113]
- H. Motion to Dismiss Adversary Proceeding filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 2/25/2022) [ECF No. 116]
- I. Notice of Hearing on Motion to Dismiss filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 2/25/2022) [ECF No. 119]

**Status:** This matter is going forward.

3. **12-01002; Picard v. The Public Institution for Social Security**

A. Memorandum of Law in Support of The Public Institution for Social Security's Motion to Strike Declaration of Brian W. Song and Song Exhibits 1-13 filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 5/26/2022) [ECF No. 130]

**Opposition Due:** June 17, 2022

**Opposition Filed:**

B. Trustee's Memorandum of Law in Opposition to Public Institution for Social Security's Motion to Strike the Declaration of Brian Song and Song Exhibits 1-13 filed by Brian Song on behalf of Irving H. Picard (Filed: 6/17/2022) [ECF No. 133]

**Replies Due:** July 1, 2022

**Replies Filed:**

C. The Public Institution for Social Security Reply in Support of its Motion to Strike Declaration of Brian W. Song and Song Exhibits 1 to 13 filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 7/1/2022) [ECF No. 135]

**Related Documents:**

D. Notice of The Public Institution for Social Security's Motion to Strike Declaration of Brian W. Song and Song Exhibits 1-13 filed by Leo Muchnik on behalf of The Public Institution for Social Security (Filed: 5/26/2022) [ECF No. 129]

E. Notice of Hearing on The Public Institution for Social Security's Motion to Strike Declaration of Brian W. Song and Song Exhibits 1-13 filed by Leo Muchnik on behalf of The Public Institution For Social Security (Filed: 5/26/2022) [ECF No. 131]

**Status:** This matter is going forward.

Dated: July 8, 2022  
New York, New York

Respectfully submitted,  
/s/ David J. Sheehan  
**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff*